

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

PROGRESSIVE AMERICAN )  
INSURANCE COMPANY, )

PLAINTIFFS-STAKEHOLDERS, )

V. )

Civil Action No.: CV-06-717.ID

CAROL THORN, et al., )

DEFENDANTS-CLAIMANTS. )

ANSWER OF DEFENDANT LV STABLER MEMORIAL HOSPITAL  
TO AMENDED COMPLAINT

Comes now the Defendant sued as LV Stabler Memorial Hospital (correctly identified as Greenville Hospital Corporation d/b/a LV Stabler Memorial Hospital) , and for Answer to Plaintiff's Amended Complaint says as follows:

1. Without sufficient information to admit or deny, therefore denied.
2. Without sufficient information to admit or deny, therefore denied.
3. Without sufficient information to admit or deny, therefore denied.
4. Without sufficient information to admit or deny, therefore denied.
5. Without sufficient information to admit or deny, therefore denied.
6. Without sufficient information to admit or deny, therefore denied.
7. Without sufficient information to admit or deny, therefore denied.
8. Without sufficient information to admit or deny, therefore denied.
9. Without sufficient information to admit or deny, therefore denied.

10. Admitted.

11. Admitted.

In addition , Defendant Hospital claims that it is entitled to an amount of the insurance proceeds equal to the amount of benefits and services provided by it to the patients treated at its facility.

/s/ Greer B. Mallette

Richard E. Smith

Greer B. Mallette

Attorneys for defendant Greenville Hospital  
Corporation d/b/a L.V. Stabler Memorial Hospital

OF COUNSEL:

CHRISTIAN & SMALL LLP  
ATTORNEYS AND COUNSELORS  
505 20TH STREET NORTH - SUITE 1800  
BIRMINGHAM AL 35203-2696  
(205) 795-6588  
(205) 328-7234 Facsimile

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a copy of the foregoing pleading upon all counsel of record in this cause by placing a copy of same in the United States mail, postage prepaid, addressed as follows on this the 16th day of July, 2007:

Mathew Richardson  
Sidney W. Jackson, III  
Jackson, Foster & Graham  
P.O. Box 2225

R. Larry Bradford  
Bradford & Sears, P.C.  
2020 Canyon Road, Suite 100  
Birmingham, AL 35216

Jimmie R. Ippolito, Jr.  
1409 Coliseum Boulevard  
Montgomery, AL 36130

/s/ Greer B. Mallette  
OF COUNSEL